

**J.R. Casillas**

**Peter F. Lacny**

DATSOPOULOS, MacDONALD & LIND, P.C.

Central Square Building

201 West Main Street, Suite 201

Missoula, Montana 59802

Telephone: (406) 728-0810

Facsimile: (406) 543-0134

[jrcasillas@dmlaw.com](mailto:jrcasillas@dmlaw.com); [placny@dmlaw.com](mailto:placny@dmlaw.com); [areiber@dmlaw.com](mailto:areiber@dmlaw.com)

*Attorneys for Kevin Washington and  
CryptoWatt Management, LLC*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION

KEVIN WASHINGTON, an individual  
and minority owner of CryptoWatt  
Investment Partners, LLC, the sole  
member of CryptoWatt Mining, LLC,

vs.

Plaintiff,

MATTHEW BRENT GOETTSCHKE,  
an individual and majority owner of  
CryptoWatt Investment Partners, LLC,  
the sole member of CryptoWatt  
Mining, LLC,

Defendant.

Cause No. CV 20-02-BU-BMM-KLD  
Cause No. CV 20-03-BU-BMM

**UNOPPOSED MOTION FOR  
LEAVE TO FILE CONFIDENTIAL  
SETTLEMENT AGREEMENT AND  
RELATED DOCUMENTS UNDER  
SEAL**

PLAINTIFFS, KEVIN WASHINGTON AND CRYPTOWATT MANAGEMENT, LLC, respectfully move this Honorable Court pursuant to Local Rule 5.2 for leave to file certain documents under seal.

Contemporaneously herewith, Washington and CryptoWatt Management, LLC are filing a Motion for Order Allowing Production & Use of Confidential Settlement Agreement and Related Documents in AAA Arbitration. In order to decide said Motion, the Court needs to review the subject Confidential Settlement Agreement and related documents. Inclusion of the Agreement and related documents in the public record is not appropriate given the strict Confidentiality Provisions in the Agreement, similar provisions in related documents implicated in the arbitration, and general concerns about the commercially and/or financially sensitive nature of the information set forth in the documents at issue. It is not feasible to file a redacted version of the documents in the public record because the Court needs to review the content as whole to rule on the Motion before the Court.

This Motion is unopposed by Rick Tabish and FX Solutions, Inc., and without waiving any rights, is also unopposed by Matthew B. Goettsche, Hard Fork Holdings, Inc., CryptoWatt Investment Partners, LLC and CryptoWatt Mining, LLC. Even if this motion was opposed the Court may rule on a motion for leave to seal without awaiting a response.

DATED this 18<sup>th</sup> day of November, 2021.

DATSOPOULOS, MacDONALD & LIND, P.C.

By: /s/ J.R. Casillas  
J.R. Casillas  
Peter F. Lacny  
201 West Main Street, Suite 201  
Missoula, Montana 59802  
jrcasillas@dmlaw.com  
placny@dmlaw.com  
*Attorneys for Washington and  
CryptoWatt Management, LLC*

**CERTIFICATE OF SERVICE**

I, J.R. Casillas, one of the attorneys for Kevin Washington and CryptoWatt Management, LLC, hereby certify that a copy of the foregoing document was served on these persons by the following means:

1, 4 CM/ECF  
       Hand Delivery  
       Mail  
       Overnight Delivery Service  
       Fax  
2, 3 Email

1. Clerk, U.S. District Court
2. Benjamin J. A. Sauter  
Kobre & Kim  
800 Third Avenue  
New York, New York 10022  
benjamin.sauter@kobrekim.com
3. Josh Kalish  
Odell Girton Siegel, LLC  
434 West 33<sup>rd</sup> Street, PH  
New York, New York 10001  
josh@ogslawllc.com
4. Robert L. Sterup  
Brown Law Firm, P.C.  
315 North 24<sup>th</sup> Street  
Billings, Montana 59101  
rsterup@brownfirm.com

DATED this 18<sup>th</sup> day of November, 2021.

DATSOPOULOS, MacDONALD & LIND, P.C.

By: /s/ J.R. Casillas  
J.R. Casillas  
Peter F. Lacny